

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLIANCE FOR AUTOMOTIVE
INNOVATION

Plaintiff,

vs.

MAURA HEALEY, ATTORNEY GENERAL
OF THE COMMONWEALTH OF
MASSACHUSETTS in her official capacity,

Defendant.

C.A. No. 1:20-cv-12090-DPW

JOINT STIPULATION AND PROPOSED SCHEDULING ORDER

As requested by the Court at the January 5, 2023 status conference, Plaintiff Alliance for Automotive Innovation (“Auto Innovators”) and Auto Care Association (“ACA”) have met and conferred regarding a proposed schedule with respect to the additional discovery ordered by the Court. ACA has informed Auto Innovators that it intends to move for a protective order with respect to the proposed deposition of its representative. Accordingly, Auto Innovators and ACA respectfully submit this Joint Stipulation and Proposed Scheduling Order for (a) conducting the additional document discovery ordered by the Court and (b) briefing that motion for a protective order:

1. On January 11, 2023, Auto Innovators will serve ACA, via e-mail to its counsel, revised deposition and document subpoenas, reflecting the limits described by the Court at the January 5, 2023 status conference.
2. On or before January 27, 2023, ACA will serve its written responses and objections and complete its production of documents in response to that document subpoena.

3. ACA will file its motion for a protective order with respect to Auto Innovators' deposition subpoena by February 1, Auto Innovators will file its opposition to such motion by February 15, and ACA will file its reply in support of its motion by February 22.

Dated: January 11, 2023

Respectfully submitted,

PLAINTIFF ALLIANCE FOR
AUTOMOTIVE INNOVATION,

By its attorneys,

/s/ Laurence A. Schoen

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CERTIFICATE OF SERVICE

I certify that on January 11, 2023, a true copy of this document will be sent electronically by the ECF system to attorneys of record identified on the Notice of Electronic Filing.

s/ Laurence A. Schoen

Laurence A. Schoen